## REMARKS

Claims 1 to 8 and 28 to 40 are pending in the application. Claims 1, 8 and 28 are independent. Favorable reconsideration and further examination are respectfully requested.

Initially, the claims were rejected under the first paragraph of §112 for allegedly not complying with the written description requirement. Without conceding the propriety of the rejection, Applicant has amended the claims, as shown above, so that their terminology more closely comports with the terminology found in the specification. In view of these amendments, withdrawal of the §112 rejection is respectfully requested.

Claims 1, 8, 16, 26, 27 and 28 were rejected under §101 for allegedly not providing a real world result. Furthermore, there was some mention in the Office Action of the database possibly being a table or list of items on paper.

The claims are directed to generating a teaser comprising text that is based on instances of the query, and to outputting the teaser. Thus, the "real world" result is the output of text that is based on the instance of a query. Applicant submits that this is as much of a "real world" result as any other computer-based output. Thus, Applicant respectfully disagrees with the statement in the Office Action that "it is lacking of conveying/transforming the result to the user". Applicant, however, will not limit its claims further by including "a user" as an element, since to do so may require presence of a user for infringement.

Regarding the comments about the database, Applicant respectfully reminds the Examiner that the claims must be read in light of the specification. There, it is clear that a database is not "a table or a list of items on a paper". Furthermore, Applicant submits that

"database" is a well-known term that is commonly understood by those in the art. Finally, Applicant submits that the claims are not directed to the database itself and, as such, it makes no difference as to exactly what form the database takes.

For at least the reasons explained above, Applicant respectfully requests withdrawal of the §101 rejection.

Claims 1, 8, 16, 26, 27 and 28 were objected to because the terms "element" and "field" were allegedly unclear. Applicant submits that the terms "element" and "field" are clear in the amended claims. Specifically, as claimed, they are parts of a database. Applicant respectfully reminds the Examiner that the claims need not set forth every detail of an invention. That is what the specification is for. In this regard, the Examiner is respectfully directed, e.g., to page 8, lines 15 et seq. for examples of elements and fields of a database.

In view of the foregoing, withdrawal of the objection is respectfully requested.

Turning to the art rejections, claims 1, 7, 8, 16, 17 and 26 to 28 were rejected over U.S. Patents Nos. 6,671,681 (Emens), 6,587,858 (Strazza), and 6,026,396 (Hall); and claims 19 to 23 were rejected over Emens, Strazza, Hall and U.S. Patent No. 6,732,088 (Glance). As shown above, Applicant has amended the claims to define the invention with greater particularity. Accordingly, withdrawal of the art rejections is respectfully requested.

Amended independent claim 1 is directed to a computer-implemented method that comprises obtaining instances of a query for a database using one or more query generation rules, where the database comprises elements, each element comprises a field, the elements comprise information and fields comprises information within the elements. The one or more

query generation rules obtain the instances of the query by annotating the query with at least one of elements and corresponding fields of the database. The computer-implemented method also includes generating a teaser that corresponds to the query, where the teaser comprises text that is based on the instances of the query. Generating the teaser comprises obtaining a common feature among the instances of the query by matching the instances of the query to one or more fields of the database, and using the common feature to generate the teaser. The teaser is output.

The applied art is not understood to disclose or to suggest the foregoing features of claim 1. As previously explained, according to Emens, queries are conceptually similar if they return similar results. Thus, Emens teaches that queries related to a given query can be determined on the basis of overlap of returned search results. That is, if items returned on the basis of query A overlap with items returned on the basis of query B to a greater extent than results for any other query, then in this sense, query B is the most closely related query the system has seen to query A. Presenting query B to the user is a way to show the issuer of query A alternative ways to explore the information space that might be useful. As correctly noted in the Office Action, however, Emens does not disclose or suggest generating a teaser.

Strazza, which was cited solely for its disclosure of an annotation tool, also does not disclose or suggest generating a teaser, as correctly noted in the Office Action.

Hall was cited for its disclosure of generating a teaser. In this regard, Hall describes a knowledge base that includes, for each file (e.g., an e-mail message), a query and a teaser. For example, Hall describes the following configuration:

> Within the knowledge base, each it(e of information (entry response) 510 is maintained as a file of four parts: an identifier for the item 512; a query expression 514 for determining relevance to a

> message seeking information; a teaser 516 that summarizes the item; and the main data or information of the item or body 518. (col. 7, lines 42 to 48),

where a teaser is a "short abstract" (col. 6, line 62). Hall, however, says very little about how its teasers are generated. Column 11 of Hall explains, as follows:

> The knowledge base maintenance feature 152f of the present invention is now discussed. In contrast with similar systems employing either fully automated or distributed human knowledge acquisition, InfoMod requires centralized human effort in building and maintaining the response knowledge base. InfoMod provides tools 152f that assist in acquiring entries and optimizing their queries. One such tool is "Acquisition". InfoMod's logging and threading facility helps acquire entries by recording and grouping messages sent to the list. This is illustrated in FIG. 4. A thread database 400 comprises threads 410, 420, 430, etc. . . . A thread 410 (group of messages on a given topic)typically has the form "question 412, response-1 414, response-2 416, . . . " If the knowledge maintainer, for example an SME, 182 (see FIG. 3) judges the thread worthy of an entry, then one can be created by editing and condensing the raw material of the thread, *with the teaser typically derived from the question 412.* The query is constructed using human judgment about which words and phrases are essential (possibly aided by a thesaurus). (col. 11, lines 11 to 27) (emphasis added)

Thus, all Hall says about generating teasers is that the teasers "are derived" from questions to which they relate. It certainly says nothing about obtaining a common feature among instances of a query by matching instances of the query to one or more fields of the database, and using the common feature to generate the teaser, as required by claim 1.

Thus, even if Hall were combined with Emens and Strazza in the manner set forth in the Office Action, the resulting hypothetical combination would still fail to disclose or to suggest the features of claim 1. Accordingly, claim 1 is believed to be patentable.

Amended independent claims 8 and 28 include features that are similar to those found in claim 1, and are also believed to be patentable.

Each of the remaining dependent claims is also believed to define patentable features of the invention. The remaining dependent claims partake of the novelty of their corresponding independent claims and, as such, have not been discussed specifically herein.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

In view of the foregoing amendments and remarks, Applicant respectfully submits that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

Applicant's undersigned attorney can be reached at the address shown below. All telephone calls should be directed to the undersigned at 617-521-7896.

Please apply any fees or credits due in this case, including claims fees, to Deposit Account 06-105, referencing 10984-601001.

Respectfully submitted,

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